REMARKS

I.   INTRODUCTION

Claims 1-40 are pending in the present application. Claims 1, 25, 29, and 37 have been amended for purposes of clarification. In an April 4, 2007, Office Action (hereinafter "Office Action"), Claims 1-40 were rejected. The Office Action rejected applicants' Claims 1-16, 19, 23-27, and 37-40 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,982,362 to Crater et al. (hereinafter "Crater") in view of U.S. Patent No. 6,085,227 to Edlund et al. (hereafter "Edlund"). Additionally, the Office Action rejected applicants' Claim 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of Edlund and further in view of U.S. Patent No. 6,698,021 to Amini et al. (hereinafter "Amini"). Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund, further in view of Amini, and still further in view of U.S. Patent No. 5,732,232 issued to Brush, II et al. (hereinafter "Brush"). Claims 21 and 28 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund and further in view of U.S. Patent No. 6,504,479 issued to Lemons et al. (hereinafter "Lemons"). Claim 22 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund and further in view of U.S. Patent No. 5,758,340 issued to Nail (hereinafter "Nail"). Claims 29-31 and 35-36 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of U.S. Patent No. 6,499,054 issued to Hesselink et al. (hereinafter "Hesselink"). Claims 32 and 34 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of Lemons. Claim 33 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of U.S. Patent No. 5,086,385, issued to Launey et al. (hereinafter "Launey").

For at least the following reasons, applicants respectfully submit that Claims 1-40 are not obvious over Crater in view of Edlund and further in view of Hesselink, Amini, Brush, Lemons,

Nail, or Launey because the prior art, alone or in combination, fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device, and the user control instructions for controlling the remote device are submitted by one authorized user at a time. Prior to discussing more detailed reasons why applicants believe that all of the claims of the present application are allowable over the cited references, a brief description of the present invention and some of the cited references is presented.

A.   Summary of the Present Invention

Aspects of the present invention are directed to a system, method, and computer-readable media that allow a user to interact with one or more remote devices in a security monitoring system. In this regard, aspects of the present invention dynamically generate a user interface that allows a user to control a remote device included in the security monitoring system. Control of the remote devices can include accessing data and issuing instructions to execute functionality on the remote device. Thereafter, user initiated control instructions may be obtained from the graphical user interface. The remote device control data corresponding to the user control instructions is processed at a central location and transmitted to the appropriate remote device where the instructions are executed.

B.   Crater

Crater is purportedly directed to a video interface for monitoring equipment states for the purpose of detecting malfunctions in industrial controls. In this regard, Crater describes a video interface architecture that enables one or more of the remote computers to download video data and associated instructions from one or more controllers. Each of the controllers is equipped to perform a control function to gather data relevant to these control functions. From the user interface described in Crater, one or more remote operators may visually check a portion of the

controlled equipment to verify that a machine is operating properly. For example, a video camera may transmit images of gauges for verification that a control parameter is being satisfied. However, Crater fails to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device. Crater further fails to teach or suggest obtaining user control instructions from the graphical user interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time.

C.   Edlund

Edlund is purportedly directed to a method, apparatus, and article of manufacture for operating remote devices over wide area networks such as the internet. In this regard, Edlund describes a system that includes client computers interacting with users to accept commands from the users to simultaneously control a remote device and display the results to the users, a proxy server computer for performing intermediate processing of the commands and the results, and a device server computer coupled to the remote device that executes the commands and generates the results. Accordingly, Edlund fails to teach or suggest that the commands to control the remote device are submitted by one user at a time.

II.   THE CLAIMS DISTINGUISHED

A.   Claims 1, 25, and 37

For purposes of this discussion, independent Claims 1, 25, and 37 of the present application will be discussed together because the same distinguishing elements over Crater and Edlund are recited in each of these claims. Claim 1 recites the following:

> 1.   A method for interacting with a remote device comprising:
>
>   obtaining a request corresponding to controlling the remote device;

generating a graphical user interface responsive to said request, the graphical user interface being operable to control the remote device, wherein controlling said remote device includes accessing said remote device and dynamically issuing instructions to manipulate an operation of the remote device;

obtaining user control instructions from said graphical user interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time;

transmitting remote device control data corresponding to said user control instructions submitted by one authorized user at a time; and

obtaining remote device data generated by said remote device in response to receipt of said remote device control data.

Similarly, Claim 25 recites the following:

25. A computer-readable medium having computer-executable components for dynamically interacting between at least one remote device and a computing device, comprising:

a user interface application operable to dynamically generate a graphical user interface corresponding to the remote device in response to a request for interaction with the remote device, wherein the graphical user interface is operable to obtain user instructions to control the remote device, and wherein the user instructions to control the remote device are submitted by one user at a time;

a device interface application operable to obtain device data from the remote device, and operable to manipulate said data; and

a data transmittal application operable to transmit said data to the computing device, and to facilitate communication between the remote device and the computing device for controlling the functionality of the remote device from the computing device, wherein controlling includes accessing the remote device and dynamically issuing instructions to manipulate the device data from the remote device.

Claim 37 recites the following:

37. A system for dynamically generating a user interface for controlling at least one remote device comprising:

at least one remote device operable to receive control commands and to transmit monitoring data based on said control commands;

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a server computer in communication with said remote device, said server computer operable to dynamically generate a graphical user interface for controlling said remote device, wherein the remote device is controlled by one authorized user at a time;

a client computer in communication with said server computer, said client computer operable to display said graphical user interface, and request said control commands for controlling said remote device, wherein controlling includes accessing the remote device and dynamically issuing instructions to manipulate an operation of the remote device.

As mentioned briefly above, the present application allows a user to interact with a remote device in a security monitoring system. In this regard, aspects of the present invention dynamically generate a user interface that allows a user to control a remote device included in the security monitoring system. More specifically, Claims 1, 25, and 37 each recite a graphical user interface operable to obtain user instructions for controlling a remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device.

As mentioned briefly above, Crater is directed to a video interface for monitoring of equipment states for the purpose of detecting malfunctions in industrial controls. In this regard, Crater describes a video interface architecture that enables a remote computer to download video data and associated instructions from one or more controllers. The remote computer includes a facility for processing the instructions to create a user interface which may include video and/or graphics or other presentations having a predetermined format. Using the system purportedly disclosed in Crater, remotely located personnel can view the displayed user interface in order to monitor the efficiency or overall behavior of the equipment, visually check machine components, workpieces, or other critical components of the controlled system. The system purportedly disclosed by Crater that permits remotely located personnel to view the displayed user interface in order to monitor the efficiency and overall behavior of the equipment and visually check

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machine and other critical components of the system is generally described at col. 2, lines 52-58, col. 3, lines 38-48 and lines 56-64, col. 8, lines 20-26, and Abstract.

In contrast to the elements recited in Claims 1, 25, and 37, Crater does not teach generating a graphical user interface for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device. In describing the problem solved by Crater, the reference states at col. 2, lines 25-29:

> ... the type of information obtainable, on demand, from a controller has been limited, while the interface used to present the information on the monitoring computer is typically crude. The latter condition results from the multiplicity of data types offered by the controller.

In order to solve this problem, the Crater system purportedly provides a graphical user interface that collects and displays a multiplicity of data types that may be provided by a controller. This multiplicity of data types may include text, graphics, video, and the like. While the Crater system generates a graphical user interface for displaying different data types, Crater does not disclose generating a graphical user interface that allows a user to control a remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device. Instead, the Crater system is directed at gathering and displaying data including visual information relevant to the control functions of various machines. The different data types monitored by the Crater system may be displayed on a Web page. For example, as stated in Crater at col. 8, lines 23-34, applets may be used that:

> ... cause a properly equipped remote monitoring computer 50 (FIG. 2) to *display* the data in a dynamic fashion, or hyperlinks to other web pages, objects or applets. For example, an applet might cause temperature data to be *displayed* as a graphical representation of a thermometer, with the height of the rendered mercury column dynamically varying in proportion to the data from I/O modules 20 (and constantly provided to the remote computer via network interface 30); pressure data might be *represented* in the form of a graphically rendered needle-type pressure gauge.

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(Emphasis added.)

From the displayed user interface described in Crater, a remote operator may visually check a portion of the controlled equipment to verify that a machine is operating in accordance with the data being received. As further described in Crater at col. 9, lines 30-37:

> For example, a command for controller actuation of a piston may be given and a video camera can be used to verify that the piston has been actuated. Additionally, a video camera can transmit images of gauges for verification that a control parameter conforms to data received from the controlled system, or that a circuit breaker has opened and a portion or all of the system has been shut down.

While monitoring machines may have benefits in the context of industrial controls, the system disclosed in Crater does not provide a graphical user interface for controlling a remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device. In this regard, by merely displaying monitored data to a user with remote access, the Crater system does not provide a way for a user to control a remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device. In contrast to the system disclosed in Crater, Claims 1, 25, and 37 of the present invention recite generating a graphical user interface operable to control the remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device. In this regard, the graphical user interface may present controls that allow a user to actively interact with a remote device. In this regard, the user interface obtains a device manipulation request to modify the state of a monitoring device such as a camera. Then, processing is performed to interpret the device manipulation request to modify the state of the monitoring device. As a result, the user can affect a directional movement in a video camera and/or alter an environmental control setting such as the temperature on a thermostat. In contrast, the Crater system is merely directed at displaying operational information about a remote device. Using the Crater system, a user would

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not be able to alter an environmental control setting such as the temperature on a thermostat or the like. Moreover, this difference is reflected in each of the pending independent claims. More specifically, as recited in Claims 1, 25, and 37, aspects of the present invention are directed at generating a graphical user interface that allows the user to control a remote device, wherein controlling the remote device includes dynamically issuing instructions to manipulate an operation of the remote device. This element of independent Claims 1, 25, and 37 is absent from the teachings of Crater.

Crater does not teach obtaining user control instructions from the graphical user interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time. Instead, Crater purportedly teaches a system in which users, with the appropriate password, may access control data simultaneously. In this regard, any user with the appropriate password may access a Web page that presents the control data simultaneously with other users.

In contrast to the system disclosed in Crater, Claims 1, 25, and 37 only allow one authorized user to submit control instructions and thus have control of the remote device at a time. As stated in the present application: "The premises server 32 accepts the connection request from the user and checks the dynamically generated user interface of the client computing device 90 to ensure the user is authorized to assume control of the specific monitoring device 34." Present application at page 16. As a result, "the client computing device has exclusive control over the specific monitoring device(s) 34." Present application at page 17. Only allowing one authorized user to submit control instructions and thus have control of the remote device is not necessary in the Crater system since industrial controls are being monitored. Instead, the Crater system allows multiple users to obtain monitoring device data so that the appropriate personnel may be notified that an industrial control, such as a machine, has

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malfunctioned. On the other hand, the present invention is directed to providing security monitoring services. In this type of system, having multiple users be able to submit control instructions and thus have control of the same monitoring device is not desirable. Thus, Crater in no way teaches generating a graphical user interface that is operable to control a remote device wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time. Accordingly, for this additional reason, Crater does not teach each element recited in Claims 1, 25, and 37.

Further, applicants assert that Edlund does not teach obtaining user control instructions from said graphical user interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time. As mentioned briefly above, Edlund is purportedly directed to a method, apparatus, and article of manufacture for operating remote devices over wide area networks such as the Internet. In this regard, Edlund describes, at Col. 5, lines 11-23:

> When a command from the user is authorized by the user manager 114 and session manager 118 on the proxy server computer 104, the task manager 120 is then invoked. The task manager 120 may translate the command into one or more device 106 dependent sub-commands.

> In addition, the task manager 120 stores these commands or sub-commands in a priority queue 126. The priority queue 126 is a temporary data structure for queuing commands before they reach the remote device 106 to ensure that a slow device 106 does not get overloaded with too many commands.

In other words, more than one authorized user can submit control instructions which are queued up before submitting these commands to the remote device in a manner so as to not overload a slow remote device. In contrast to the system disclosed in Edlund, Claims 1, 25, and 37 of the present invention recite obtaining user control instructions from said graphical user

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interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time.

Whether or not Crater and Edlund are properly combined, Crater and Edlund do not teach, suggest, or describe the foregoing aspects of the invention recited in independent Claims 1, 25, and 37. Generally described, under 35 U.S.C. § 103(a), a *prima facie* case of obviousness can be established only if the cited references, alone or in combination, teach each and every element recited in the claim. *In re Bell*, 991 F2d 781 (Fed. Cir. 1993). Crater and Edlund, alone or in combination, fail to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device, and the user control instructions for controlling the remote device are submitted by one authorized user at a time. Accordingly, applicants respectfully submit that independent Claims 1, 25, and 37 are allowable in view of the teachings of Crater and Edlund taken alone or in combination.

B.   Claims 2-16, 19, 23-24, 26-27, and 38-40

Claims 2-16, 19, 26-27, and 38-40 depend on the independent Claims 1, 25, and 37, respectively. Moreover, Claims 23-24, are computer-readable media and computer system claims with elements that parallel independent Claims 1, 25, and 37. As discussed above, Crater and Edlund, taken alone or in combination, fail to teach or suggest generating a graphical user interface responsive to a request for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device, and the user control instructions for controlling the remote device are submitted by one authorized user at a time. Accordingly, for the above-mentioned reasons, Claims 2-16, 19, 23-24, 26-27, and 38-40 are also allowable over Crater in view of Edlund. Additionally, these claims are not

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unpatentable over Crater in view of Edlund for additional reasons, some of which are discussed in further detail below.

Claim 2

Claim 2 includes the element of "wherein generating a graphical user interface includes dynamically generating a graphical user interface." As described above, Crater is directed at a video interface architecture for industrial control systems in which data is collected from various controllers. Those skilled in the art and others will recognize that controllers are devices with embedded software components (sometimes referred to as "firmware") that are incapable of being modified. In this regard, Crater states at col. 10, lines 34-38: "every controller in the system is constantly active and in communication with network 55, facilitating access by computer to any controller-based web pages at any time." By contrast, aspects of the present invention do not present data to a user based on the controller in which the data was collected. Instead, a graphical user interface is dynamically generated based on input received from a user. Since the Crater system does not dynamically generate a graphical user interface based on input received from the user, Crater in no way teaches the additional elements recited in Claim 2. Thus, for at least this additional reason, Claim 2 recites a combination of features neither taught not suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 103(a) rejection of Claim 2. Applicants further request withdrawal of the § 103(a) rejection of Claims 3-9, which depend from Claim 2.

Claim 3

Claim 3 adds the additional element of "identifying a remote device corresponding to said request." Data displayed to a user in the Crater system is presented in discrete Web items that "are contained in the web pages of one or more controllers." See Crater at col. 10, lines 25-26. Since the Web items that are displayed to the user are based on information received from a

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controller, the Crater system does not identify individual devices that correspond to a request. Instead, users are required to navigate to web pages with static addresses that present data obtained from a particular controller. In contrast, aspects of the present invention obtain input from a user that identifies one more monitoring devices in which data will be obtained. Accordingly, Crater fails to teach or suggest the additional element recited in Claim 3. Thus, for at least this additional reason, Claim 3 recites a combination of features neither taught not suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 103(a) rejection of Claim 3.

Claim 4

Claim 4 is dependent on Claim 2 and further defines dynamically generating a graphical user interface to include: (a) identifying two or more remote devices corresponding to said request; (b) selecting a program module corresponding to each identified remote device from a plurality of program modules, said program modules operable to control said remote device; and (c) generating a single screen interface containing all program modules, said program modules operable to generate graphical user interface components corresponding to each requested remote device.

The Office Action contends that Crater teaches the data from many remote devices can be displayed together. However, Crater further teaches that this data from many devices is linked or permanently associated with one another. Col. 9, lines 57-61 states: "if a cluster of controllers is operationally related such that data from one is usefully combined with data from the others, each page of the cluster can contain instructions to access the other pages." These instructions to access other pages is pre-determined based on the specific device that is monitored, not selected by the specific request of a user, as claimed in Claim 4. Thus, since the data from one or more device is linked or permanently associated, Crater fails to teach a controller that selects a

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program module corresponding to each identified remote device in the request from a plurality of program modules and generates a single screen interface containing all program modules. Thus, for at least this additional reason, Claim 4 recites a combination of features neither taught not suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 103(a) rejection of Claim 4. Applicants further request withdrawal of the § 103(a) rejection of Claim 5, which depends from Claim 4.

<u>Claim 15</u>

Claim 15 has the additional element of "wherein transmitting data includes manipulating operating parameters of said remote device using said graphical user interface and wherein obtaining remote device data includes obtaining remote device data generated by said remote device based on said manipulated operating parameters." In accordance with one aspect of the present invention, data is obtained at a remote device that includes the operating parameters of the remote device. For example, if the remote device is a video camera, the operating parameters may include information regarding whether the video camera is able to perform functions such as, but not limited to, zooming, panning, tilting, and the like. Generally stated, these operating parameters describe the abilities of the remote device. As recited in Claim 15, these operating parameters are obtained and manipulated so that an appropriate graphical user interface may be generated. For example, in order to provide functionality that allows a user to control the remote device, these operating parameters are processed so that the appropriate controls may be presented on the graphical user interface. The Office Action asserts that Crater teaches manipulating operating parameters of said remote device using said graphical user interface and wherein obtaining remote device data includes obtaining remote device data generated by said remote device based on said manipulated operating parameters. In support of that proposition, the Office Action cites col. 9, lines 4-12, of Crater, which states that:

... the monitoring engineer may select which video camera image from the images captured by the video camera bank is to be displayed, as well as the length of time such display is desired. The monitoring engineer scanning the video/graphic display may decide, for example, to make an adjustment to the equipment and to check visually to ascertain whether the expected response or event has occurred at the remote machine or in the remote process in response to the adjustment.

While the cited portion of Crater describes a system in which an engineer may select a particular video camera, it does not teach the additional element of manipulating operating parameters of a remote device. For example, the cited portion of Crater does not teach obtaining operating parameters that would allow a user to "zoom-in" on an industrial control. Accordingly, Crater fails to teach or suggest the additional elements recited in Claim 15. Thus, for at least this additional reason, Claim 15 recites a combination of features neither taught not suggested by Crater. Accordingly, applicants respectfully request withdrawal of the § 103(a) rejection of Claim 15.

C.   Claims 17-18, 20-22, and 28-36

The Office Action rejected Claims 17-18, 20-22, and 28-36 under 35 U.S.C. § 103(a) as being obvious over Crater in view of various combinations of Edlund, Hesselink, Amini, Brush, Lemons, Launey, and Nail. The Office Action asserts that various combinations of cited references disclose each of the elements of applicants' claims and that it would have been obvious to a person of ordinary skill in the art to combine the teachings of the cited references at the time the invention was made. As described in more detail below, the cited references fail to disclose or suggest elements of both the independent and dependent claims. Moreover, applicants submit that it would not have been obvious to combine the teachings of the cited references at the time the invention was made.

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1.   Claim 29

The Office Action rejected Claims 29 under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink. The Office Action asserts that Crater and Hesselink disclose each of the elements of applicants' claims and that it would have been obvious to a person of ordinary skill in the art to combine the teachings of the cited references at the time the invention was made. Applicants respectfully disagree.

As amended, Claim 29 recites:

> 29.   In a computer system including a client device in communication with a central server via a communication network, a method for dynamically generating a graphical user interface for controlling at least one pre-selected remote device comprising:
>
> obtaining a request to control at least one pre-selected remote device from the client device by a central server and selecting one or more program modules from a plurality of program modules in response to said request and corresponding to said request to control the at least one pre-selected remote device, said one or more program modules operable to control said remote device; and
>
> transmitting a screen interface with said one or more program modules, wherein said screen interface containing said one or more program modules is operable to generate a graphical user interface for controlling at least one pre-selected remote device when loaded within a browser application on the client device, wherein controlling includes accessing the at least one pre-selected remote device and dynamically issuing instructions to manipulate an operation of the at least one pre-selected remote device.

As discussed above in relation to Claims 1, 25, and 37, Crater does not teach generating a graphical user interface for controlling a remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the remote device and obtaining user control instructions from said graphical user interface for controlling the remote device, wherein the user control instructions for controlling the remote device are submitted by one authorized user at a time. Accordingly, Crater could not teach the elements as recited in

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Claim 29. In this regard, data displayed to a user in the Crater system is presented on web pages that each correspond to a different controller. See Crater at col. 10, lines 25-26. Since each web page is based on information received from a controller, the Crater system does not obtain "a request to control at least one pre-selected remote device." Instead, in the Crater system, users are required to navigate to web pages that display data obtained from a particular controller. In contrast, aspects of the present invention obtain input from a user that includes a request to control at least one pre-selected remote device in which data will be obtained. Then, based on this input, a graphical user interface that is appropriate for the remote device is generated. Applicants further submit that Hesselink fails to address the deficiencies associated with Crater.

The Office Action asserts that it would have been obvious to one of ordinary skill in the art to modify Crater with the teachings of Hesselink and include a central server to control a pre-selected device. Applicants again respectfully disagree. There simply is no teaching or suggestion in Crater to modify Crater with the teachings of Hesselink to include a central server comprising at least a mass memory that includes an operating system, a data processing application module, a premises server interface module, and a client computing device interface module, amongst other elements in order to control a pre-selected device. See FIGURE 4 of the present application.

Further, there simply is no teaching or suggestion in Crater or Hesselink to modify either reference or combine their teachings. Nor is there any basis for concluding that they could be combined. None of the references suggest the combination, and applicants submit that there is no basis for concluding that it would be obvious to combine the teachings of these references in any manner, much less in the manner recited in Claim 29. Furthermore, even if combinable, which applicants categorically deny, the resultant combination, as set forth above, would not meet the recitations of Claim 29.

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To establish a *prima facie* case of obviousness of a claim, the prior art references must teach or suggest each and every element as set forth in the claim. *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Applicants respectfully submit that Crater and Hesselink, alone or in combination, fail to teach or suggest each and every element as set forth in Claim 29. As explained above, Crater and Hesselink, either alone or in combination, fail to teach or suggest at least obtaining a request to control at least one pre-selected remote device and generating a graphical user interface for controlling at least one pre-selected remote device, wherein controlling includes dynamically issuing instructions to manipulate an operation of the at least one pre-selected remote device as recited in Claim 29. Accordingly, applicants respectfully request withdrawal of the pending rejection under 35 U.S.C. § 103 with regard to Claim 29.

2.   Claims 30-31 and 35-36

Claims 30-31 depend on independent Claim 29. Similarly, Claims 35-36 are computer-readable media claims with elements that parallel Claim 29. As discussed above, Crater and Hesselink fail to teach or suggest generating a graphical user interface operable to control a remote device as recited in Claim 29. Accordingly for the above-mentioned reasons, Claims 30-31 and 35-36 are also allowable over Crater in view of Hesselink. Additionally, the dependent claims add to the nonobviousness of applicants' invention, some of the reasons which are discussed in further detail below.

Claim 30

Claim 30 includes the element of "wherein said request to control includes two or more preselected devices, and wherein said screen interface is an integrated screen interface containing said program modules, said program modules operable to generate a graphical user interface corresponding to said requested remote device when said single screen interface is loaded on a browser application." As described above, Crater is directed at a video interface architecture for

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industrial control systems in which data is collected from various controllers. In this regard, Crater states at col. 10, lines 34-38: "every controller in the system is constantly active and in communication with network 55, facilitating access by computer to any controller-based web pages . . . ." By contrast, Claim 29 includes the element of generating a graphical user interface corresponding to said requested remote device. Since the Crater system does not generate a graphical user interface based on input received from the user that identifies a remote device, Crater in no way teaches the additional elements recited in Claim 30.

      3.   <u>Claims 17-18, 20-22, 28, and 32-34</u>

As noted above, the Office Action rejected applicants' Claim 17 under 35 U.S.C. § 103(a) as obvious over Crater in view of Edlund and further in view of Amini. Claims 18 and 20 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund in view of Amini and further in view of Brush. Claims 21 and 28 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund and further in view of Lemons. Claim 22 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Edlund and further in view of Nail. Claims 32 and 34 were rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view of Hesselink and further in view of Lemons. Claim 33 was rejected under 35 U.S.C. § 103(a) as being obvious over Crater in view Hesselink and further in view of Launey. Because a dependent claim carries each and every limitation of the claim it depends on, the references, either alone or in combination, fail to teach or suggest each of the limitations as discussed above. Applicants further submit that the additional cited references fail to address the deficiencies associated with Crater. Accordingly, for this reason, applicants respectfully submit that the rejection of Claims 17-18, 20-22, 28, and 32-34 is in error and request that it be withdrawn.

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CONCLUSION

Based on the above-referenced arguments, applicants respectfully submit that all pending claims of the present application are patentable, nonobvious, and allowable over the cited and applied references, either alone or in combination. Because the cited and applied references, either alone or in combination, fail to teach or suggest each element of the pending claims, applicants respectfully request withdrawal of the rejections of the claims and allowance of the present application.

If any questions remain, applicants request that the Examiner contact the undersigned at the telephone number listed below.

Respectfully submitted,

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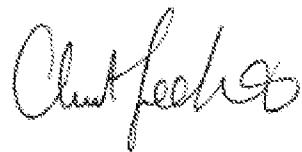
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